

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

RAMIRO FELIX GONZALES,

Plaintiff,

V.

BRYAN COLLIER, Executive Director
of the Texas Department of Criminal
Justice, BOBBY LUMPKIN, Director
of the Texas Department of Criminal
Justice–Correctional Institutions
Division, and DENNIS CROWLEY,
Warden of the Huntsville Unit,
Defendants.

CIVIL ACTION NO. 4:21-CV-00828

**DEFENDANTS' UNOPPOSED MOTION TO SEAL DEFENDANTS'
PROPOSED FINDINGS OF FACT AND CONCLUSIONS OF LAW**

Defendants Bryan Collier, Bobby Lumpkin, and Dennis Crowley (collectively, “Defendants”), by and through the Office of the Attorney General of Texas, respectfully request to file their Proposed Findings of Fact and Conclusions of Law.

Defendants filing includes proposed findings that cover every detail of the execution chamber and the process. The information implicates the security of the execution process because it is not information available to the public and could be used to circumvent security measures if it was filed publicly. Sealing this documents would be consistent with the court's previous orders granting motions to seal documents in this case based on security implications.

Respectfully submitted,

KEN PAXTON
Attorney General of Texas

BRENT WEBSTER
First Assistant Attorney General

GRANT DORFMAN
Deputy First Assistant Attorney General

SHAWN E. COWLES
Deputy Attorney General for Civil Litigation

SHANNA E. MOLINARE
Division Chief
Law Enforcement Defense Division

/s/ Leah O'Leary
LEAH O'LEARY
Assistant Attorney General
Attorney-in-Charge
State Bar No. 24079074
Southern District No. 1563191
Leah.Oleary@oag.texas.gov

Law Enforcement Defense Division
OFFICE OF THE ATTORNEY GENERAL
P.O. Box 12548
Austin, Texas 78711-2548
(512) 463-2080 / Fax (512) 370-9918

**ATTORNEYS FOR DEFENDANTS
COLLIER, LUMPKIN, AND CROWLEY**

CERTIFICATE OF CONFERENCE

I, Leah O'Leary, certify that on June 29, 2022, I conferred with counsel for Plaintiff Gonzales regarding the request presented in this motion. Plaintiff is unopposed to Defendants' request to file their reply to Plaintiff's response to Defendants' motion for summary judgment.

/s/ Leah O'Leary
Leah O'Leary
Assistant Attorney General

CERTIFICATE OF SERVICE AND ELECTRONIC FILING

I, Leah O'Leary, certify that on June 29, 2022, I electronically filed the foregoing document with the Clerk of the Court for the United States Court for the Southern District of Texas using the electronic case-filing (ECF) system of the Court, which electronically serves all counsel of record and registered users in this case.

/s/ Leah O'Leary
Leah O'Leary
Assistant Attorney General